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Subject: Mann v. Plus One, etc.

From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>

Date: Tue, Feb 05, 2008 9:24 am

To: "numoh@umohlaw.com" <numoh@umohlaw.com>

Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

Dear Uwe:

I sincerely believe in litigating cases as civilly and professionally as possible. That is why I immediately granted your request for an extension of time to respond to our discovery requests.

I have just reviewed what you e-mailed at 11:44 p.m. last night. You have not provided any responsive information or documents. All you have provided are boiler-plate, spurious objections to virtually every request propounded on Ms. Mann by Plus One and Mr. MacDonald. There can be no good faith basis for this lack of compliance with your basic discovery obligations.

Please provide full and complete responses to our clients' interrogatories and document requests by no later than Friday. If you refuse, please so advise me immediately so I can contact the Court. Given the obvious absence of any effort by you and your client to comply with your discovery obligations, I will be seeking sanctions.

I will let you know if we can proceed with Plaintiff's deposition next week when I have had a chance to talk with Harold. I think it is unlikely.

Deborah

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